

### **REMARKS**

Applicants' invention relates to a process for the preparation of a patterned polyurethane backed tufted good. The process comprises (1) applying a puddle of a reactive polyurethane mixture to the back side of a greige good or a precoated greige good, (2) passing the greige good coated with the reactive polyurethane mixture under a doctoring device, and (3) curing the polyurethane backed greige good which exhibits the desired pattern in the polyurethane backing. In the present invention, the edge of the doctoring device is patterned or has a removable attachment that is patterned, thereby forming a pattern in the polyurethane mixture as it passes under the edge of the doctoring device or removable attachment. Suitable reactive mixtures comprise (a) at least one polyisocyanate component, (b) at least one isocyanate-reactive component, (c) at least one non-Newtonian thickener, and (d) at least one filler.

In accordance with the previous restriction requirement under 35 U.S.C. 121, Claims 1-10 and 13-15 are presently being prosecuted, and Claims 11, 12, and 16-31 have been withdrawn from consideration.

### **Rejection under 35 U.S.C. 102(b)**

Claims 1 and 2 continue to be rejected under 35 U.S.C. 102(b) as being anticipated by the Bogdany reference (U.S. Patent 4,423,103).

The Bogdany reference discloses a method of forming patterns on fabrics such as, for example, carpets. This method comprises pouring and spreading a liquid frothed organic polymeric composition on the advancing surface of a fabric to form a froth layer of substantially uniform gauge on the fabric, creating a pattern in the froth by reciprocating one or more rakes with a plurality of tines across and through the froth as it advances beneath the rake, and curing the froth to result in a fabric with a solid, adherent, patterned froth or cellular layer on the fabric. The tines of the rake penetrate at least the outer surface layers of the froth and they are positioned at an angle of from about 45 to about 135 degrees to the surface of the froth. Carpets having a resilient foam underlay adhered to the back of the carpet and comprising a plurality of parallel, serpentine rows of a cured cellular organic polymeric composition are also described.

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The Bogdany reference does not fairly anticipate the presently claimed invention.

The proper standard of anticipation is one of strict identity. (See *In re Donohue*, 226 U.S.P.Q. 619 (Fed. Cir 1985). The court clearly indicated that a rejection based on anticipation "requires a showing that each limitation of a claim must be found in a single reference, practice, or device". This is clearly not the case in the present rejection.

It is respectfully submitted that the Bogdany reference does not disclose Applicants presently claimed invention. The Bogdany requires both a doctor blade or bar to doctor the froth to the required thickness, and a rake with tines which is from 3 to 20 feet behind the doctor blade or bar (see column 1, line 68 through column 2, line 6; and column 3, lines 8-12). It is readily apparent that the thickness of the froth on the back of the fabric or substrate is controlled by the doctor blade or doctor bar. It is also apparent from the Bogdany reference that the pattern is formed in the froth by the rake and that this occurs after the thickness of the froth has been adjusted by the doctor blade or bar. Specifically, it is the tines of the rake that form the pattern in the froth of the Bogdany reference. (See column 2, lines 3-6; column 2, line 59 through column 3, line 22.)

Applicants note that the Examiner continues to characterize the rake in this reference as "a second doctor blade that is patterned to form a pattern in the polyurethane mixture" (see page 3 of the final Office Action dated June 28, 2004, section 5, second paragraph, lines 4-5 therein). It is respectfully submitted that this is an improper characterization of the Bogdany reference and its disclosure!

The rake with tines as described by this reference is not properly characterized as "doctor blade" or "doctor bar"! It is apparent from this characterization that the Examiner is selectively reading the reference to arrive at an interpretation of the reference that is **contrary** to the disclosure and to how one of ordinary skill in the art would interpret the disclosure as meaning. A proper construction of invention of the Bogdany reference must correspond to that which is expressly disclosed and described therein if the Examiner is seeking to establish that this invention anticipates that which Applicants are presently claiming. Personal opinions of the Examiner are simply not relevant!

It is clearly improper for the rake of the Bogdany reference to be considered a "doctor blade". Applicants respectfully submit that it is evident from the express disclosure of the Bogdany reference that he was clearly aware of "doctor blades", yet the term "rake" was selected to describe the portion of the device which forms the pattern in the froth! Obviously, Bogdany did not consider this a doctor blade or a doctor bar! It is therefore improper for the Examiner to construe this reference as teaching or disclosing something that is clearly not disclosed or described!

As set forth above by Applicants, it is evident that the Bogdany reference requires both a doctor blade to control the thickness of the froth, and a rake with tines to form a pattern in the doctored froth. The rake is a minimum of about 3 feet behind to a maximum of about 20 feet behind the doctor blade. See column 3, lines 8-12.

By comparison, the present invention only requires a doctor blade. This doctor blade may have either a patterned edge or a removable attachment wherein the attachment is patterned (page 10, lines 24-31). Applicants found that it is **not** necessary to first pass the froth under a doctor blade to adjust or control the thickness of the froth and then to form the pattern in the froth as is done in the Bogdany reference. Rather, in accordance with the presently claimed invention, one doctor blade can control the thickness of the froth and simultaneously form the pattern in the froth. Of course, the doctor blade or doctor bar of the present invention either has a patterned edge or has a removable attachment with a patterned edge as required by the present claims.

Applicants respectfully submit that the Bogdany reference does not disclose the presently claimed invention with the specificity of an anticipatory reference! The presently claimed process accomplishes in one step (i.e. controlling thickness and forming a pattern) what requires two different steps in this reference! Accordingly, the Bogdany reference simply can not anticipate the presently claimed process!

Even if the Examiner can properly consider the "second doctoring device, i.e. the 'rake'..." of the Bogdany reference as a "patterned doctoring device" as asserted on page 3, section 5, last sentence of the second paragraph therein, this does not change the fact that the process disclosed by this reference requires that the thickness of the froth be adjusted in a first step by a doctor bar or doctor blade, and the pattern be formed in the froth in a second step by the rake! The statement by the

Examiner that the rake is a **second** doctoring device clearly indicates that he realizes the Bogdany reference uses two different process steps, one for controlling thickness of the froth and one for forming the pattern in the froth. The Bogdany reference simply does not disclose or suggest that these can be done simultaneously in one step as Applicants claims require! Therefore, this reference does not properly anticipate the presently claimed invention.

Even the optional embodiment of the present invention where two doctor blades are present as disclosed on page 9, line 32 through page 10, line 9, and page 10, line 19 through page 11, line 4, is also not anticipated by the Bogdany reference. As described therein, when two doctor blades are present in Applicants invention, there are two different puddles of reactive mixture being applied. The first puddle is applied prior to the first doctor blade and this is described as the precoat which is formed initially on the back side of the greige good. See page 9, line 32 through page 10, line 9. Precoats are clearly optional in the broadest sense of the present invention and as it is claimed in Claim 1 of the application.

In this optional embodiment, after forming the precoat, a second puddle of a reactive polyurethane mixture is applied to the back side of the precoat, and this puddle is passed under the doctor blade which is either patterned or has a removable attachment which is patterned. Obviously, in either embodiment of the present invention, the doctor blade which is patterned or has a removable attachment which is patterned must also gauge the thickness of the reactive polyurethane puddle that is applied immediately before this doctor blade and simultaneously form the desired pattern in the reactive polyurethane puddle. There is simply no information disclosed in the Bogdany reference which indicates that one doctor blade (patterned or not) can do both!

It is further noted by Applicants that the Bogdany reference does not disclose applying a second puddle of froth after the first doctor blade and before the rake (or second doctor blade) as is required by this particular embodiment of the present application. Even if it is proper to consider the rake with tines of the Bogdany reference "equivalent" to a doctor blade with a patterned edge or having a removable attachment which is patterned, the process described by this reference does not apply a second puddle of froth between these! This optional embodiment of the presently claimed process has two doctor blades and requires that two puddles of

froth be applied, one before each of the doctor blades. For this reason, it is evident that the presently claimed invention is not anticipated by the Bogdany reference.

Finally, Applicants respectfully submit that the presently claimed invention is not anticipated by the Bogdany reference as the presently required non-Newtonian thickeners are not disclosed or described by the reference. The Examiner's statement that "Bogdany teaches the polyurethane mixture comprises polyisocyanate, polyol, and other materials including clay, calcium carbonate, silica, etc (i.e. non-Newtonian thickeners)..." is simply not correct. Clay, calcium carbonate, silica, and other such components disclosed by Bogdany as suitable for the polyurethane mixture by this reference are **not** non-Newtonian thickeners! One of ordinary skill in the art would readily recognize and understand this.

These materials are described by the Bogdany reference as fillers at column 5, lines 12-15. It is readily apparent these fillers essentially correspond to the fillers described in the present application at page 7, lines 4-13, and are identified as component (d) of present Claim 1. These fillers would be recognized by one of ordinary skill in the art as conventional fillers typically used in carpet backing formulations.

Non-Newtonian thickeners, i.e. component (c), of the present invention, are clearly **not** disclosed or suggested by the Bogdany reference. The present application describes these non-Newtonian thickeners on page 7, line 14 through page 9, line 20, with inorganic thickeners being specifically described on page 7, line 19 through page 8, line 27. Suitable materials to be used as non-Newtonian inorganic thickeners include precipitated calcium carbonate, finely divided clays (e.g. smectite or layered clays), and precipitated or fumed silica. Obviously, these are specific materials which are clearly distinguishable from the conventional fillers (component d) of the present application and of the Bogdany reference.

Applicants presently claimed invention requires at least one non-Newtonian thickener. Non-Newtonian thickeners are clearly not disclosed or suggested by the Bogdany reference. Accordingly, the presently claimed invention requires a froth having a specific component which is not identified or mentioned by this reference. Thus, the Bogdany reference can not properly anticipate the presently claimed invention.

For these reasons, Applicants respectfully submit that the presently claimed invention is not properly rejected as being anticipated by the Bogdany reference. It is respectfully requested that this rejection be withdrawn.

**Rejections under 35 U.S.C. 103(a)**

Claims 1-10 and 13-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over the Holeschovsky et al reference (WO 00/37737 believed to correspond to U.S. Patent 6,264,775) in view of any one of the Stidham reference (U.S. Patent 4,354,810), the Satiar reference (GB 2160790, the Davis et al reference (U.S. 5,045,375) or the Bogdany reference (U.S. 4,423,103).

The Holeschovsky et al reference describes a process for the production of face-up coating of carpet backs with polyurethane. The polyurethane adhesives of this reference enable one to run polyurethane backed carpet manufacturing lines in the same "face up" manner that is practiced with conventional latex adhesive carpet manufacturing equipment, without excessive dripping or running of the polyurethane adhesive due to changes in viscosity in the curing oven. Before this invention, it was necessary to run carpet laminating lines which used polyurethane reactive mixtures with the reverse side of the greige good facing up, to prevent loss of the polyurethane during the curing process. (See column 1, lines 5-8; column 2, lines 19-32; and column 2, lines 59-64.) The polyurethane adhesives suitable for this process contain non-Newtonian thickeners which result in the viscosity of the polyurethane being less sensitive to temperature changes (column 2, line 64 through column 3, line 1).

The Stidham reference describes an apparatus to distribute a foamed composition on a movable substrate. A method for distributing a foamed fluid composition on a movable substrate to produce a foamed sheet material is also described. In particular, in this apparatus, a substrate is delivered from a feed roll or other means under a foam supply nozzle from which a foamed fluid is supplied from a reservoir, then the substrate with the foam composition is passed under a distribution means. This distribution means comprises a rotatable member and at least two attached distribution means which distribute the foamed composition on the substrate to form a foamed sheet material. The foamed sheet material then passes through other equipment such as, for example, a heating oven to dry and cure the

foam before taking up the foamed sheet material on a roll. The distribution means or apparatus is a modified doctor roll comprising a rotatable member with a circular cross section having a number of attached distribution means with longitudinal arcuate sections (i.e. sleeve members) of about equal length to and concentric with the rotatable member and with inner surfaces that conform with the external surface of the rotatable member. The rotatable member is positioned such that only one of the sleeve members distributes the foamed composition on the substrate. These sleeve members impart the final surface pattern to the foamed sheet material. Different sleeve members produce different surface patterns. (See column 3, lines 10-22; column 3, lines 58-68; column 4, lines 15-26, lines 34-40 and lines 53-62.)

The manufacture of carpet underlays which incorporate a layer of foamed rubber, and the formation on the surface of the rubber of distinctive patterns which enhance the product appearance and its performance are described by the Satiar reference. A foamed rubber latex is deposited on a surface of a sheet of backing material or on the reverse side of the carpet, and this material is then moved under a doctor blade which extends transversely across the surface and spreads the latex foam over the surface. This is followed by imparting reciprocating movements between the surface and the doctor blade, which result in a pattern in the foamed rubber while the rubber is spread across the surface, and then dried. This reference is specific to rubber latex systems. Polyurethane foams are not even disclosed or suggested.

The Davis et al reference describes a nonskid polyurethane coating. This coating is provided by placing or forming a patterned polyurethane on the carpet, wherein the polyurethane is permanently tacky. A method for forming the precoat coating is also disclosed. This method comprises preparing a precoat, applying the precoat to the substrate in a predetermined thickness, preparing a nonskid coating comprising a polyurethane and including a fast reacting means for forming a polyurea to render the nonskid coating thixotropic. These nonskid coatings can be applied in a uniform coating, or in the form of ribs or other discrete shapes placed on the back of the carpeting. Notched (or patterned) doctor blades are disclosed therein for creating ribs and reducing the quantity of material required for the nonskid coating.

Applicants respectfully submit that this combination of references does not render the presently claimed invention obvious.

The Holeschovsky et al reference discloses a polyurethane adhesive composition which enables the preparation of carpet backs via a face-up coating process. This polyurethane adhesive comprises a polyisocyanate component, an isocyanate-reactive component, and either a non-Newtonian thickener or a viscosity index improving additive. Thus, it is clear that the polyurethane composition of this reference may be virtually identical to the polyurethane composition of the presently claimed invention.

As described by this reference, conventional polyurethane compositions can not be applied to a greige good in the traditional "face-up" manner used to apply latex compositions to the back of a greige good. This is due to the fact that a conventional polyurethane compositions applied to the back of a greige good decreases in viscosity as the coated greige good passes through the curing oven, such that the polyurethane compositions drip and run off the back of the greige good. It is for this reason that polyurethane backed carpets are typically formed in a face-down process in which the reverse side of the greige good faces up, the polyurethane composition is applied to the reverse side, and the coated greige good passes through the curing oven in this face-down manner. See column 1, line 58 through column 2, line 56.

Another problem faced when using polyurethane compositions to form backings on greige goods, is the formation of a pattern in the polyurethane composition. This is discussed in the present specification on page 2, lines 21-32. Embossing rollers work well with latex compositions. However, polyurethane compositions tend to stick to embossing rollers unless the roller contacts the surface precisely at the point where sufficient urethane skin is on the surface of the polyurethane composition to minimize sticking but the core of the polyurethane composition is still liquid to permit formation of a pattern.

Of the secondary references cited by the Examiner in the obviousness rejection, polyurethanes are disclosed as suitable compositions by the Stidham reference (see column 6, lines 33-36), the Davis et al reference (see column 4, lines 43-64, and column 5, lines 4-29), and the Bogdany reference (see column 4, lines 2-38). The Satiar reference only discloses foamed rubber which comprises latex



(natural or synthetic) as a suitable backing composition (see page 1, lines 4-14). Accordingly, the Satiar reference is not particularly relevant to the presently claimed invention.

One of ordinary skill in the art has no insight into the present invention upon reading this reference combined with the Holeschovsky et al reference. Neither of these reference disclose any information which would lead one of ordinary skill in the art to reasonably believe and/or expect that a pattern could be formed in the polyurethane compositions of the Holeschovsky et al reference by the process described in the Satiar reference. In fact, there is nothing disclosed in either reference which would lead the skilled artisan to conclude that the polyurethane compositions of the Holeschovsky et al reference, when dried and processed in the usual manner will not collapse under the action of gravity as described on page 1, lines 60-65 of the Satiar reference. Applicants therefore submit that the presently claimed invention is not suggested to one of ordinary skill in the art by combining the Holeschovsky et al reference with the Satiar reference.

Although the remaining secondary references disclose polyurethane compositions, it is at best "obvious to try" to substitute the polyurethane composition of the Holeschovsky et al reference for the polyurethane composition of the secondary references. The Stidham reference broadly discloses polyurethane foam, but the only working example therein uses styrene-butadiene latex. Similarly, the Bogdany reference broadly discloses that liquid catalyzed polyisocyanate-polyol surfactant systems, acrylic acid polymers and copolymers, carboxylated conjugated diene copolymers, etc. may be used as the liquid polymer. However, this reference does not contain any working examples.

As Applicants previously stated, one common problem in creating patterns in polyurethane systems, particularly with an embossing roller, is the fact that the polyurethane tends to stick to the embossing roller. This is discussed in depth on page 2, lines 21-32 of the present application. The Stidham reference provides no information or guidance to one of ordinary skill in the art on how to prevent this. It is simply not apparent to the skilled artisan that the polyurethane compositions of the Holeschovsky et al reference which contain non-Newtonian thickeners overcome this problem associated with conventional polyurethane compositions and the problem with retaining the pattern in the foam throughout the curing region.

Only after reading Applicants' specification does this become obvious to one of ordinary skill in the art. Such a perspective does **not**, however, provide a proper basis for a rejection under 35 U.S.C. §103.

The Bogdany reference discloses that the rake with tines therein can form a pattern in the froth or foamed layer of material and avoid the need for an embossing roller (see column 1, lines 32-45). It further discloses that the rake is positioned behind the doctor blade, after the froth has been doctored to the required thickness, from about 3 to about 20 feet, depending on the type of polymer system used and the pot life of this system (column 3, lines 8-12). Thus, it is readily apparent that the type of froth or foam layer determines how long after doctoring the froth or foam layer one must wait to form the pattern in the froth or foam layer.

Applicants respectfully submit that one of ordinary skill in the art has no insight into the fact that if the polyurethane compositions which contain non-Newtonian thickeners as described in the Holeschovsky et al reference are used to form a pattern in, it is not necessary to form the pattern at some point after the froth or foam has been raked to the pre-determined thickness! Rather, the skilled artisan would still expect from this combination of references that one must wait either until after the specified distance (i.e. 3 to 20 feet) is passed or for a specific point in the pot life before forming the pattern as described above. It is simply not obvious to one of ordinary skill in the art that the polyurethane compositions of the Holeschovsky et al reference allow a pattern to be formed immediately at the point of adjusting the thickness, instead of at a later point in time! This is clearly not suggested to the skilled artisan by this combination of references.

Finally, the Davis et al reference discloses polyurethane compositions that differ from those of the Holeschovsky et al reference. More specifically, this reference describes polyurethane compositions as secondary coatings (or non-skid coatings) which comprise a di- or poly-functional isocyanate, a di- or poly-functional polyol and a di- or tri-functional aliphatic or aromatic amine. This composition enables the secondary coating to remain in place and to retain the desired shape (see column 5, lines 4-12). The Davis et al reference also discloses that these secondary coatings may be patterned (column 3, lines 7-17). Patterns may be formed by applying the nonskid coating in the form of ribs or other discrete shapes on the back of the carpeting, or by using a notched doctor blade such that all of the

nonskid coating is removed except that which passes through the notches in the doctor blade. The amine reacts quickly to form a thixotropic gel structure that holds the coating in the configuration in which it was applied (column 5, lines 15-29; column 7, lines 10-16).

Although it is apparent from the Davis et al reference that some polyurethane compositions (such as those described therein) are suitable for forming patterns, the reference combined with the Holeschovsky et al reference simply does not provide a proper basis for one of ordinary skill in the art to reasonably conclude and/or expect that the polyurethane compositions of the Holeschovsky et al reference which contain non-Newtonian thickeners, are also capable of maintaining a pattern once it is formed! This is simply not suggested by either of these references!

In fact, if the calcium carbonate filler disclosed in the polyurethane precoat formulation at column 4, lines 54-64 of the Davis et al reference is a non-Newtonian thickener and/or equivalent to one as asserted by the Examiner, the precoat of the Davis et al reference would also be capable of maintaining a pattern formed in the precoat. That, however, is clearly not the case. See column 4, line 65 through column 5, line 3. Thus, assuming that the calcium carbonate filler of the precoat is equivalent to the presently required non-Newtonian thickeners as asserted by the Examiner, one of ordinary skill in the art would clearly not expect the compositions of the Holeschovsky et al reference to be suitable for forming the nonskid coatings of the Davis et al reference.

Also, the Davis et al reference requires that the belt which contacts the precoat of polyurethane material be of a material which will not adhere to the polyurethane or for the belt to be coated with a release paper (column 2, lines 6-15). Applicants submit that it is apparent that Davis et al also recognize as set forth in the present specification that urethane mixtures have a tendency to stick to certain types of surfaces such as belts, embossing rollers, etc. (see page 2, lines 21-32 of the present application). Since the Davis et al reference clearly distinguishes between the composition of the precoat and the composition of nonskid or secondary coatings (see column 4, lines 43-64; column 5, lines 4-29), one of ordinary skill in the art would clearly recognize and understand that not all compositions are suitable for forming the secondary or nonskid coating as not all can be manipulated to remain in place and retain the desired shape as disclosed at column 5, lines 7-9 and column 7,

lines 10-17 of the Davis et al reference. One of ordinary skill in the art has no insight into whether the polyurethane compositions described in the Holeschovsky et al reference would be so suitable!

At best, the Examiner is relying on an "obvious to try" standard of patentability. This is **not** the correct standard under 35 U.S.C. §103!

Applicants respectfully submit that the presently claimed invention is not fairly suggested to one of ordinary skill in the art upon reading the Holeschovsky et al reference in combination with the Stidham reference, the Satiar reference, the Davis et al reference or the Bogdany reference. Only after reading the present specification does it become apparent to the skilled artisan that the polyurethane compositions comprising non-Newtonian thickeners of the Holeschovsky et al reference are suitable for forming patterns and capable of retaining the formed pattern. Such a perspective does **not**, however, provide a proper basis for the rejection of the presently claimed invention as being *prima facie* obvious under 35 U.S.C. 103(a).

Claims 1-10 and 13-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over the Stidham reference (U.S. Patent 4,354,810) in view of the Holeschovsky et al reference (WO 00/37737 believed to correspond to U.S. Patent 6,264,775).

Applicants respectfully submit that one of ordinary skill in the art has no insight into the presently claimed invention from this combination of references. As discussed hereinabove, this combination of references does not provide a reasonable basis which would lead the skilled artisan to substitute the polyurethane compositions of the Holeschovsky et al reference for the latex compositions of the Stidham reference and expect the polyurethane composition to maintain the desired shape of the pattern. As set forth on page 2, lines 21-32 of the present application, one of ordinary skill in the art readily knows and understands that urethane compositions tend to stick to embossing type rollers. Accordingly, the skilled artisan would expect the polyurethane compositions of the Holeschovsky et al reference to behave similarly and stick to the cylindrical rotating member of the distribution apparatus in the Stidham reference. Thus, one of ordinary skill in the art would not be motivated to make the necessary substitution to "arrive at" the presently claimed invention.

It is therefore submitted that this combination of references does not fairly suggest the presently claimed invention to one of ordinary skill in the art.

Claims 3-10 and 13-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over the Bogdany reference (U.S. Patent 4,423,103) in view of the Holeschovsky et al reference (WO 00/37737 believed to correspond to U.S. Patent 6,264,775).

Combining the Bogdany reference with the Holeschovsky et al reference also does not fairly suggest Applicants' claimed invention to the skilled artisan. For the same reasons as discussed above with respect to the Stidham reference combined with the Holschovsky et al reference, one would not be motivated to make the necessary substitution to "arrive at" the presently claimed invention. Rather, the skilled artisan would believe that the polyurethane compositions of the Holeschovsky et al reference, like other known polyurethane compositions suitable for carpet backing applications, would stick to the tines of the rake and/or not be able to retain the shape/pattern formed in the compositions both before and during curing of the compositions. There is no information disclosed in either the Bogdany reference or the Holeschovsky et al reference which would lead the skilled artisan to reasonably expect these compositions to be capable of this. Accordingly, the presently claimed invention is not obvious to one of ordinary skill in the art from this combination of references.

In view of the preceding remarks, Applicants respectfully submit that each of these rejections are in error and request that they be withdrawn. The allowance of Claims 1-10 and 13-15 is respectfully requested.

Respectfully submitted,

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